

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

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REPLY TO THE ATTENTION OF:

Mr. Johnny W. Reising

SRF-5J

United States Department of Energy Feed Materials Production Center P.O. Box 398705 Cincinnati, Ohio 45239-8705

A1, P2 Pre-Design

Investigation Survey

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) Project Specific Plan (PSP) for the Area 1, Phase 2 predesign investigation survey.

This document provides a plan for conducting scanning surveys and sampling of Area 1, Phase 2 surface soil to delineate areas requiring excavation.

U.S. EPA's specific comments are enclosed. Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

James A. Saric

Remedial Project Manager

Federal Facilities Section

SFD Remedial Response Branch #2

Enclosure

Tom Schneider, OEPA-SWDO Bill Murphie, U.S. DOE-HDQ John Bradburne, FERMCO Terry Hagen, FERMCO Tom Walsh, FERMCO

TECHNICAL REVIEW COMMENTS ON "AREA 1 PHASE II PRE-DESIGN INVESTIGATION SURVEY PROJECT SPECIFIC PLAN"

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

GENERAL COMMENT

Commenting Organization: U.S. EPA Commentor: Saric Section #: 1.4 Page #: 2 Line #: 26-28

Original General Comment #: 1

Comment: The text states that total uranium concentration values of 66 and 800 parts per million (ppm) will be used as decision drivers for additional investigative activities and that these radiation tracking system (RTRACK) data trigger levels will ensure that actual soil concentrations do not exceed final remediation level (FRL) and waste acceptance criteria (WAC) values, respectively. However, no supporting data are provided to justify these statements. Information to support the use of these trigger levels either needs to be provided in the document or incorporated by reference.

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric Section #: 1.4 Page #: 2 Line #: Not applicable (NA) Original Specific Comment #: 1

Comment: The text in this section states that the surveys will use the RTRACK measurement of 66 ppm total uranium as a decision level. It is assumed that this value was derived from 80 percent of the 80 ppm FRL for uranium. However, during the Area 1 Phase I project, the "as low as reasonably achievable" level of 50 ppm was used for uranium instead of the FRL as the target cleanup level for determining the adequacy of remediation. Therefore, the text should be modified to use 40 ppm of uranium as the decision driver for this preliminary survey.

Commenting Organization: U.S. EPA Commentor: Saric Section #: 2.3.1 Page #: 7 Line #: NA

Original Specific Comment #: 2

Comment: The text of the third paragraph states that contingency sampling for subsurface samples will be conducted at one node in each grid. The terms "node" and "grid" can have several meanings and have led to confusion during previous projects. To minimize misunderstandings, these terms should be revised to "HPGe measurement point" and "acre," respectively, or to similar unambiguous terms.